



Patrick O'Shaughnessy &lt;poshaughnessy@sacattorneys.com&gt;

---

**Re: Protective Order in Abittan v. Chao et al.**

---

Patrick O'Shaughnessy &lt;poshaughnessy@sacattorneys.com&gt;

Mon, Jun 26, 2023 at 1:58 PM

To: Constantine Economides &lt;ceconomides@fnf.law&gt;, Brianna Pierce &lt;bpierce@fnf.law&gt;

Cc: Jingjing Ye &lt;jye@yefirm.com&gt;, James Cai &lt;jcai@sacattorneys.com&gt;

Hi Constantine and Brianna,

I hope the trial is going well. Attached please find an updated draft protective order for the Abittan v. Chao et al. case that incorporates the concept Brianna and I discussed of document sharing between the state and federal cases. I put our edits directly into the track changes version Brianna sent me.

All comments and questions are welcome, and I look forward to speaking with you later today.

Best regards,  
Patrick O'Shaughnessy  
Attorney at Law  
SAC Attorneys LLP

1754 Technology Drive-Suite 122  
San Jose, CA 95110  
Tel: (408) 436-0789 x 204  
Fax: (408) 436-0758  
Cell: (408) 899-5070

This e-mail is intended only for the proper person to whom it is addressed and may contain legally privileged and/or confidential information. If you received this communication erroneously, please notify me by reply e-mail, delete this e-mail and all your copies of this e-mail and do not review, disseminate, redistribute, make other use of, rely upon, or copy this communication. Thank you.



On Sun, Jun 25, 2023 at 2:41 PM Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com> wrote:

Hi Constantine,

Yes, and good luck with the trial tomorrow.

Also, I will plan on sending you and Brianna an updated draft protective order, along with a redline comparing it to the version Brianna sent me, in advance of the call.

Please feel free to call me anytime tomorrow evening at (408) 899-5070.

Best regards,  
Patrick O'Shaughnessy  
Attorney at Law  
SAC Attorneys LLP

1754 Technology Drive-Suite 122  
San Jose, CA 95110  
Tel: (408) 436-0789 x 204

Fax: (408) 436-0758

Cell: (408) 899-5070

This e-mail is intended only for the proper person to whom it is addressed and may contain legally privileged and/or confidential information. If you received this communication erroneously, please notify me by reply e-mail, delete this e-mail and all your copies of this e-mail and do not review, disseminate, redistribute, make other use of, rely upon, or copy this communication. Thank you.



On Sun, Jun 25, 2023 at 10:48 AM Constantine Economides <ceconomides@fnf.law> wrote:

Patrick,

Could we schedule a time to discuss the schedule in this case?

I will be in trial until about 6pm ET tomorrow but could speak after that time.

Thanks,

Constantine

**Constantine P. Economides**

Partner

---

Freedman Normand Friedland LLP

SunTrust International Center

1 S.E. 3rd Avenue

Suite 1240

Miami, FL 33131

(t) (305) 851-5997

(@) [ceconomides@fnf.law](mailto:ceconomides@fnf.law)

---

**2 attachments**



**06.26.2023 Draft Protective Order (Clean).docx**  
52K



**06.26.2023 Draft Protective Order.docx**  
56K